

Exhibit A

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, ss

**PLYMOUTH SUPERIOR COURT
DOCKET NO.**

BARBARA BOSWORTH,

PLAINTIFF

v.

THE FRESH MARKET, INC.,

DEFENDANT

COMPLAINT AND JURY CLAIM

THE PARTIES

1. The Plaintiff, Barbara Bosworth, is an individual residing in Braintree, Norfolk County, Massachusetts.
2. The Defendant, The Fresh Market, Inc. is a corporation with a principal place of business located at 628 Green Valley Road, Suite 500, Greensboro, North Carolina with a retail location in Hingham, Plymouth County, Massachusetts.

JURISDICTION

3. This is a fall down incident that occurred on or about October 22, 2020 at or around the premises owned and/or controlled by the Defendant located at 11 Essington Drive, Hingham, Plymouth County, Massachusetts.
4. At all relevant times the Defendant was the owner/controller of the aforesaid premises.
5. The aforesaid event caused the Plaintiff to suffer substantial injuries, as well as medical expenses.

COUNT ONE
NEGLIGENCE

6. On or about October 22, 2020, the Plaintiff fell while on the Defendant's premises located at 11 Essington Drive, Hingham, Plymouth County, Massachusetts when she was struck by a shopping cart full of groceries that a cashier had pushed into her.
7. The Plaintiff, who at all relevant times was lawfully upon said premises, was acting with due care and caution, and at no point did she contribute to or cause the injuries she suffered in this loss.
8. The aforesaid accident was caused by the Defendant negligently failing to maintain a safe premises.
9. As a result thereof, the Plaintiff was caused to sustain injuries.
10. As a direct and proximate result of the negligence and carelessness of the Defendant, the Plaintiff sustained serious and permanent personal injuries, suffered great pain of body and mind, and was obliged to expend monies for medical care and attendance.
11. The Plaintiff was at all times, pertinent to this Complaint, in the exercise of due care.

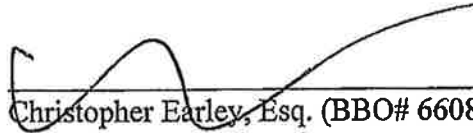
WHEREFORE, the Plaintiff demands judgment against the Defendant in an amount which the Court would deem fair and reasonable, plus interest, costs, and attorney's fees.

THE PLAINTIFF DEMANDS TRIAL BY JURY ON ALL ISSUES SO TRIABLE.

Respectfully submitted,

The Plaintiff,

By her Attorneys,



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